

REMARKS

Upon entry of this Response, claims 1-30 remain pending in the present patent application. Claims 1-4, 6-7, 10-13, 15-16, 19-22, 24-25, and 28-30 have been amended herein. Applicant requests reconsideration of the pending claims in view of the following remarks.

In item 3 of the Office Action, it is noted that the foreign patent GB 2300991A filed in the Information Disclosure Statement was not considered as a copy of the reference was not actually included with the IDS. In response, Applicant will file a supplemental Information Disclosure Statement with a copy of the aforementioned foreign patent in compliance with 37 C.F.R. 1.98(a)(2).

In item 6 of the Office Action, claims 1-30 have been rejected under 35 U.S.C. §112, 2nd paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as to the invention. Appropriate amendments were made to claims 1, 10, and 19 to address the issue noted. Consequently, Applicant requests that the rejection of claims 1-30 under 35 U.S.C. §112, 2nd paragraph be withdrawn.

Next, in item 9 of the Office Action, claims 1-30 have been rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent 5,655,130 issued to Dodge et al. (hereafter "*Dodge*"). Anticipation under §102 "requires the disclosure in a single prior art reference of each element of the claim under construction. W.L. Gore & Associates, Inc. v. Garlock, Inc., 220 U.S.P.Q. 303, 313 (Fed. Cir. 1983). Applicants assert that Dodge fails to show or suggest each of the elements of independent claims 1, 10, and 19 as amended. Accordingly, Applicants respectfully request that the rejection of claims 1, 10, and 19 be withdrawn. Also, Applicants request that the rejection of claims 2-9, 11-18, and 20-30 be withdrawn as depending from claims 1, 10, and 19, respectively.

To begin, claim 1 has been amended as follows:

1. A method for formatting a publication, comprising the steps of:
 - associating a content item with a publication in the server;
 - identifying one of a plurality of presentation platforms for a presentation of the publication, wherein the publication may be

embodied in any one of a plurality of digital formats, each of the digital formats being unique with respect to each other, and each of the digital formats being recognizable by a corresponding one of the presentation platforms; and

generating an output file in the server, the output file embodying the publication including the content item in a respective one of the digital formats recognizable by the identified one of the presentation platforms.

As set forth above, claim 1 specifies the step of identifying one of a plurality of presentation platforms for a presentation of a publication, where the publication may be embodied in any one of a plurality of digital formats, and each of the digital formats is unique with respect to each other. Also, each of the digital formats is recognizable by a ***corresponding one of the presentation platforms***. Also, claim 1 has been amended to reflect the fact that an output file embodying the publication is generated in a respective one of the digital formats that is recognizable by the identified one of the presentation platforms.

As was stated in the response to the previous Office Action, *Dodge* teaches the creation of documents that are about different platforms. Specifically, at column 6, lines 32-43, *Dodge* states:

"Here is an example of CDS document generation system might be used. Suppose a software product runs on a PC, a UNIX system and a mainframe. The software basically operates the same on all three platforms, but there are significant differences that must be addressed in the user documentation. A typical documentation group would create, generate, and deliver three separate sets of documentation-one for each platform. This is inefficient, redundant, and costly for the documentation group and customers who use the product on two or three of the platforms must use separate, redundant document sets.

As stated above, the documents that are generated from the database described by *Dodge* are all generated or presented on the same presentation platform. In this respect, all the documents are created based upon a single digital format that is recognizable by a single presentation platform. It is the content of each document that differs based on the platform that is the subject of discussion in the documents themselves. Thus, there is no need to identify one of a plurality of presentation platforms as set forth in claim 1. Also, as claim 1 sets forth, each of the presentation

platforms is capable of presenting a document that is embodied in a digital format that is recognizable by it.

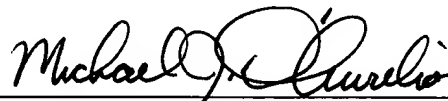
Since *Dodge* only contemplates presenting the different documents about different platforms on the same presentation platform, *Dodge* fails to show or suggest identifying a presentation platform from a plurality of such platforms for the presentation of a document. The discussion of multiple "platforms" in *Dodge* merely refers to the subject matter to be included in a document, rather than the platform upon which the document is to be presented.

Consequently, *Dodge* fails to show or suggest each of the elements of claim 1, as amended above. Also, Applicants assert that *Dodge* fails to show or suggest each of the elements of claims 10 and 19 for similar reasons as described above. Accordingly, Applicants request that the rejection of claims 1, 10, and 19 be withdrawn. In addition, various other ones of the claims have been amended so as to be compatible with the amendments made to claims 1, 10, and 19. Therefore, Applicants respectfully request that the rejection of these claims be withdrawn as depending ultimately from claims 1, 10, and 19.

CONCLUSION

Applicants respectfully request that all outstanding objections and rejections be withdrawn and that this application and all presently pending claims be allowed to issue. If the Examiner has any questions or comments regarding this Response, the Examiner is encouraged to telephone the undersigned counsel of Applicants.

Respectfully submitted,



Michael J. D'Aurelio
Reg. No. 40,977

Thomas, Kayden, Horstemeyer & Risley, L.L.P.
100 Galleria Parkway, N.W., Suite 1750
Atlanta, Georgia 30339-5948
Phone: (770) 933-9500
Fax: (770) 951-0933